

JUDGE BAER

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

HUSSEIN ALI NASSER,
HWA SHAN WANG,
a/k/a "Sam Wang,"
HUSSEIN CHAHINE,
HASSAN CHAHINE, and
ALI FAYAD NASSER,

Defendants.

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INDICTMENT

07 Cr. _____

07 CRIM 1147

COUNT ONE

The Grand Jury charges:

1. From in or about August 2003, up to and including in or about November 2007, in the Southern District of New York and elsewhere, HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, HASSAN CHAHINE, and ALI FAYAD NASSER, the defendants, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 2320 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, HASSAN CHAHINE, and ALI FAYAD NASSER, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly would and did traffic and attempt

to traffic in goods and services and use counterfeit marks on and in connection with such goods and services, in violation of Title 18, United States Code, Section 2320.

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York, and elsewhere:

a. On or about November 11, 2006, HWA SHAN WANG, a/k/a "Sam Wang," the defendant, sent an e-mail to HUSSEIN ALI NASSER, the defendant, with an attachment that contained a summary of monies paid to WANG for counterfeit clothing.

b. In or about February 2007, HUSSEIN CHAHINE, the defendant, sold counterfeit clothing to a confidential informant from a store located in New York, New York.

c. On or about June 13, 2007, HASSAN CHAHINE, the defendant, had a telephone conversation with HUSSEIN ALI NASSER, the defendant, relating to the trafficking of counterfeit clothing.

d. On or about July 12, 2007, HUSSEIN ALI NASSER, the defendant, had a telephone conversation with HWA SHAN WANG, a/k/a "Sam Wang," the defendant relating to the trafficking of counterfeit clothing.

e. On or about July 19, 2007, ALI FAYAD NASSER, the defendant, had a telephone conversation with HUSSEIN ALI NASSER, the defendant, relating to the trafficking of counterfeit clothing.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. From in or about August 2003, up to and including in or about November 2007, in the Southern District of New York and elsewhere, HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, HASSAN CHAHINE, and ALI FAYAD NASSER, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly trafficked and attempted to traffic in goods and services and knowingly used counterfeit marks on and in connection with such goods and services, to wit, the defendants trafficked in counterfeit clothing and other merchandise bearing various urban and hip-hop style designer labels.

(Title 18, United States Code, Sections 2320 and 2.)

COUNT THREE

The Grand Jury further charges:

5. From in or about August 2003, up to and including in or about November 2007, in the Southern District of New York and elsewhere, HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, and HASSAN CHAHINE, the defendants, and

others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, in violation of Title 18, United States Code, Section 1956(h).

6. It was a part and an object of the conspiracy that HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, and HASSAN CHAHINE, the defendants, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, unlawfully, willfully and knowingly would and did conduct and attempt to conduct such a financial transaction, which in fact involved the proceeds of specified unlawful activity, to wit, trafficking in counterfeit goods in violation of Title 18, United States Code, Section 2320, with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

7. It was further a part and an object of the conspiracy that HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, and HASSAN CHAHINE, the defendants, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, unlawfully, willfully and knowingly would and did conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of specified unlawful

activity, to wit, trafficking in counterfeit goods in violation of Title 18, United States Code, Section 2320, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

8. It was further a part and an object of the conspiracy that HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, and HASSAN CHAHINE, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, unlawfully, willfully, and knowingly transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, monetary instruments and funds from a place in the United States to and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, trafficking in counterfeit goods, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

OVERT ACTS

9. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, was committed in the Southern District of New York and elsewhere:

a. On or about June 5, 2007, HWA SHAN WANG, a/k/a "Sam Wang," the defendant, sent an e-mail to HUSSEIN ALI NASSER, the defendant, relating to the concealment and transportation of cash as payment for counterfeit goods and the transportation of counterfeit goods.

b. On or about June 26, 2007, HUSSEIN ALI NASSER, the defendant, who was in New York, New York, had a telephone conversation with HWA SHAN WANG, a/k/a "Sam Wang," relating to money laundering activities.

c. On or about July 17, 2007, HUSSEIN CHAHINE, the defendant, had a telephone conversation with HWA SHAN WANG, a/k/a "Sam Wang," the defendant relating to the shipment of a package containing cash proceeds from the sale of counterfeit goods.

d. On or about November 6, 2007, HWA SHAN WANG, a/k/a "Sam Wang," the defendant, caused approximately \$54,321 to be wired from a bank in Queens, New York, to a bank in Guangzhou, China.

e. On or about November 7, 2007, HASSAN CHAHINE, the defendant, delivered a package containing cash to a warehouse in New Jersey.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATIONS

10. As the result of committing the conspiracy offenses in violation of Title 18, United States Code, Section 371, alleged in Counts One and Three of this Indictment, HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, HASSAN CHAHINE, and ALI FAYAD NASSER, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to the following:

a. At least \$19,703,396 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the conspiracy offense, in violation of Title 18, United States Code, Sections 371, for which the defendants are jointly and severally liable (the "Money Judgment").

b. Approximately \$40,000 in United States currency, in that such sum constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the conspiracy offenses alleged in Counts One and Three of the Indictment.

c. All United States currency funds or other monetary instruments credited to accounts in the name of Zhao

Zhan Wu, including but not limited to account number 39652399, held at Citibank, N.A.

d. All United States currency funds or other monetary instruments credited to accounts in the name of Hwa Shan Wang, Virtue Fashion, Inc., Fantex International Co., Ltd., OTC Trading Corporation, Solomon Imports, Inc., Chang-Yeh Tsai, and Ai Chai Wang, including but not limited to account numbers 326009930, 326006332, 326007629, 320029299, 32009930, 32111831, 32125025, 22913246, 350010280 held at China Trust Bank.

e. Three safety deposit boxes numbered 32111831, 32125025 and 32142335, in the name of Hwa Shan Wang, located at China Trust Bank, 41-99 Main Street, Flushing, New York, and the items contained therein.

11. As the result of committing the counterfeit clothing trafficking offense in violation of Title 18, United States Code, Sections 2320 and 2, alleged in Count Two of this Indictment, HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, HASSAN CHAHINE, and ALI FAYAD NASSER, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to the following:

a. At least \$19,703,396 in United States currency, in that such sum in aggregate is property representing the

amount of proceeds obtained as a result of the conspiracy offense, in violation of Title 18, United States Code, Sections 371, for which the defendants are jointly and severally liable (the "Money Judgment").

b. Approximately \$40,000 in United States currency, in that such sum constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the conspiracy offenses alleged in Counts One and Three of the Indictment.

c. All United States currency funds or other monetary instruments credited to accounts in the name of Zhao Zhan Wu, including but not limited to account number 39652399, held at Citibank, N.A.

d. All United States currency funds or other monetary instruments credited to accounts in the name of Hwa Shan Wang, Virtue Fashion, Inc., Fantex International Co., Ltd., OTC Trading Corporation, Solomon Imports, Inc., Chang-Yeh Tsai, and Ai Chai Wang, including but not limited to account numbers 326009930, 326006332, 326007629, 320029299, 32009930, 32111831, 32125025, 22913246, 350010280 held at China Trust Bank.

e. Three safety deposit boxes numbered 32111831, 32125025 and 32142335, in the name of Hwa Shan Wang, located at China Trust Bank, 41-99 Main Street, Flushing, New York, and the items contained therein.

12. As the result of committing one or more of the money laundering offenses in violation of 18 U.S.C. § 1956, alleged in Count Three of this Indictment, HUSSEIN ALI NASSER, HWA SHAN WANG, a/k/a "Sam Wang," HUSSEIN CHAHINE, HASSAN CHAHINE, and ALI FAYAD NASSER, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, all property, real and personal, involved in the money laundering offenses and all property traceable to such property, including but not limited to limited to the following:

a. At least \$19,703,396 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the conspiracy offense, in violation of Title 18, United States Code, Sections 371, for which the defendants are jointly and severally liable (the "Money Judgment").

b. Approximately \$40,000 in United States currency, in that such sum constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the conspiracy offenses alleged in Counts One and Three of the Indictment.

c. All United States currency funds or other monetary instruments credited to accounts in the name of Zhao Zhan Wu, including but not limited to account number 39652399, held at Citibank, N.A.

d. All United States currency funds or other monetary instruments credited to accounts in the name of Hwa Shan Wang, Virtue Fashion, Inc., Fantex International Co., Ltd., OTC Trading Corporation, Solomon Imports, Inc., Chang-Yeh Tsai, and Ai Chai Wang, including but not limited to account numbers 326009930, 326006332, 326007629, 320029299, 32009930, 32111831, 32125025, 22913246, 350010280 held at China Trust Bank.

e. Three safety deposit boxes numbered 32111831, 32125025 and 32142335, in the name of Hwa Shan Wang, located at China Trust Bank, 41-99 Main Street, Flushing, New York, and the items contained therein.

Substitute Asset Provision

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;


(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, and 1956, and Title 28, United States Code, Section 2461)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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HUSSEIN ALI NASSER,
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Defendants.

INDICTMENT

07 Cr.

(Title 18, United States Code,
Sections 371, 1956(h), 2320 and 2)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Armand C. J. [Signature]
Foreperson.

*12/14/07 Filed indictment. Case assigned to
Judge [Signature]
[Signature]*